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13 GOOGLE LLC

14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN JOSE DIVISION

19 JOSEPH TAYLOR, EDWARD MLAKAR,
20 MICK CLEARY, and EUGENE ALVIS,
21 individually and on behalf of all others
similarly situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC,

25 Defendant.

Case No. 5:20-cv-07956-VKD

**ARIANA E. BUSTOS DECLARATION ISO
GOOGLE LLC'S OMNIBUS MOTION TO
SEAL MATERIALS FILED BETWEEN
MARCH 11, 2025, AND JULY 29, 2025**

Judge: Hon. Virginia K. DeMarchi

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28 **BUSTOS DECL. ISO GOOGLE'S OMNIBUS
MOT. TO SEAL
CASE No. 5:20-cv-07956-VKD**

I, Ariana E. Bustos, hereby declare as follows:

1. I am an attorney at the law firm of Cooley LLP and an attorney of record for Google LLC (“Google”) in *Taylor et al. v. Google LLC*, Case No. 5:20-cv-07956-VKD. I am licensed to practice law in the state of California and am admitted to practice before this Court. I submit this declaration in support of Google’s Omnibus Motion to Seal Materials Filed Between March 11, 2025, and July 29, 2025 (“Omnibus Motion”). I have personal knowledge of the facts herein and if called to testify, could and would testify competently hereto.

2. Google has reviewed and narrowly tailored its sealing requests. The highlighting in the exhibits corresponds to the proposed sealing described by the declarations of Mr. Grant Baillie (“Baillie Decl.”), Mr. Christof Klausecker (“Klausecker Decl.”), Dr. Eric Gustafson (“Gustafson Decl.”), Mr. Aaron Stacy (“Stacy Decl.”), Mr. Sundeep Sancheti (“Sancheti Decl.”), and Ms. Borbala Benko (“Benko Decl.”) (collectively, “Google Employee Declarations”).

3. The right-hand column in the chart in Paragraph 5 indicates the Google Employee Declaration(s) that support sealing of the corresponding document, the parenthetical indicates which page of the exhibit that declaration supports sealing for.

4. The Court in the parallel California state court case *Csupo v. Google LLC*, No. 19CV352557 (“*Csupo*”) has already found that the materials warrant sealing. An asterisk (“*”) after an Exhibit number in the chart in Paragraph 5 indicates this material was previously ordered sealed in *Csupo*. A dagger (“†”) after an Exhibit number indicates substantially similar material was previously ordered sealed in *Csupo*.

5. I have reviewed the documents that Google seeks to file under seal. Based on my review and experience with other litigation involving Google, and in consultation with my client, I understand that there are compelling reasons to seal the following information:

Attorney Exhibit	Document	Sealed Portion	Sealing Supported By
Plaintiffs’ Motion to Certify Class (3/11/2025)			
1†	Memorandum of Points and Authorities iso Plaintiffs' Motion to Certify Class	Highlighted portions at Pg. 4-9	Klausecker Decl. (Pg. 4); Stacy Decl. (Pg. 5); Baillie Decl. (Pg. 6, 7, 8); Gustafson Decl. (Pg. 9)

Declaration of Karma M. Giulianelli ISO Motion to Certify Class (3/11/2025)			
2†	Exhibit 5 Expert Report of Dr. Jeffrey A. Stec (11/12/24)	Highlighted portions at Pg. i, 4-7, 12-18, 20, 25-28, 35-38, 40, 42-56	Sancheti Decl.
3†	Exhibit 7 Expert Report of Dr. Christopher Jules White (11/12/24)	Highlighted portions at Pg. 10, 11, 14-25, 30, 33, 56-62, 64-70, 73-84, 86-88	Sancheti Decl. (Pg. 10-11, 14-20); Baillie (Pg. 21); Klausecker (Pg. 22-25, 56-62, 64-70); Stacy Decl. (Pg. 33, 74-84, 86-88); Benko Decl. (Pg. 73-74)
4*	Exhibit 8 GOOG-CSUPO-00011375	Fully Under Seal	Stacy Decl.
5†	Exhibit 9 Expert Report of Christopher Thompson	Highlighted portions at Pg. 10-46, 49-56, 60-69, 73, 75, 80, 88-90, 92-93	Baillie Decl. (Pg. 10-30, 60); Do Decl. (Pg. 31-44); Sancheti Decl. (Pg. 45-46); Gustafson Decl. (Pg. 49-50, 54-56); Benko Decl. (Pg. 51-53); Klausecker (Pg. 61-69, 73, 75, 80); Sancheti Decl. (Pg. 88-90, 92-93)
6*	Exhibit 10 GOOG-CSUPO-00039092	Fully Under Seal	Klausecker Decl.; Sancheti Decl.
7*	Exhibit 11 GOOG-CSUPO-00024260	Fully Under Seal	Klausecker Decl.
8†	Exhibit 12 GOOG-CSUPO-00026178	Fully Under Seal	Klausecker Decl.
9*	Exhibit 13 GOOG-CSUPO-00040081	Fully Under Seal	Klausecker Decl.
10	Exhibit 14 Expert Report of Dr. Douglas Schmidt (1/9/23)	Highlighted portions at Pg. ii, iii, 7, 11, 17-35, 38-62, 64-74, 79-80, 82-84, 90-92, 101-108	Sancheti Decl. (ii, iii, 7, 11, 17-18, 38-62, 64-65, 79-80, 90-92); Baillie Decl. (Pg. 19-28, 82-84, 101-108); Do Decl. (Pg. 28-35); Klausecker Decl. (Pg. 65-75)
11*	Exhibit 16 GOOG-CSUPO-00008253	Fully Under Seal	Baillie Decl.
12*	Exhibit 17 GOOG-CSUPO-00026970	Fully Under Seal	Klausecker Decl.
13*	Exhibit 18 GOOG-CSUPO-00006929	Fully Under Seal	Baillie Decl.
14*	Exhibit 19 GOOG-CSUPO-00010614	Fully Under Seal	Baillie Decl.
15*	Exhibit 20 GOOG-CSUPO-00008277	Fully Under Seal	Klausecker Decl.; Do Decl.

16†	Exhibit 21 Source Code Review Appendix of Christopher Thompson	Fully Under Seal	Sancheti Decl.
17*	Exhibit 22 GOOG-CSUPO-00020323	Fully Under Seal	Sancheti Decl.
18*	Exhibit 23 GOOG-CSUPO-00043314	Fully Under Seal	Sancheti Decl.
19*	Exhibit 25 GOOG-CSUPO-00017131	Fully Under Seal	Sancheti Decl.
20*	Exhibit 26 GOOG-CSUPO-00062727	Fully Under Seal	Sancheti Decl.
Google's Opposition to Plaintiffs' Motion for Class Cert (5/7/2025)			
21†	Memorandum of Points and Authorities iso Google's Opposition to Plaintiffs' Motion for Class Cert	Highlighted portions at Pg. 3-5, 21	Benko Decl. (Pg. 3,4,21); Do Decl. (Pg. 4); Gustafson Decl. (Pg. 5)
22†	Declaration of Borbala Benko ISO Google's Opp. to Class Cert	Highlighted portions at Pg. 3-6	Benko Decl.
Declaration of Whitty Somvichian ISO Google's Opp. to Class Cert			
23†	Exhibit 1 Expert Report of Dr. Kevin Jeffay (3/10/25)	Highlighted portions at Pg. 21-27, 34-38, 40, 42-45, 54-57, 61-65, 68, 70-71	Benko Decl. (Pg. 21-27); Baillie Decl. (Pg. 34-38, 40, 61-65); Klausecker Decl. (Pg. 42-44); Sancheti Decl. (Pg. 45, 54-57, 70-71); Do Decl. (Pg. 68)
24†	Exhibit 4 Expert Report of Dr. Kevin Jeffay (3/10/23)	Highlighted portions at Pg. 7-9, 11-13, 21-22, 24, 27-28, 76-41, 45-46, 53-56	Klausecker Decl. (Pg. 7-9, 21-22, 37-41); Sancheti Decl. (Pg. 9, 11-13, 27-28); Baillie Decl. (Pg. 24, 45-46, 53-56)
25†	Exhibit 5 Jeffay's Supplemental Analysis of Network Usage Data (3/10/25)	Highlighted portions at Pg. 8, 19, 21-22	Baillie Decl. (Pg. 8); Klausecker Decl. (Pg. 19, 21-22)
26†	Exhibit 6 Expert Report of Dr. Sandeep Chatterjee (1/15/25)	Highlighted portions at Pg. 43	Gustafson Decl.
10*	Exhibit 7 <i>Csupo</i> Expert Report of Dr. Douglas Schmidt (1/9/23)	Highlighted portions at Pg. ii, iii, 7, 11, 17-35, 38-62, 64-74, 80, 82-84, 90-92, 101-108	Sancheti Decl. (ii, iii, 7, 11, 17-18, 38-62, 64-65, 79-80, 90-92); Baillie Decl. (Pg. 19-28, 82-84, 101-108); Do Decl. (Pg. 28-35); Klausecker Decl. (Pg. 65-75)

2†	Exhibit 8 Expert Report of Dr. Jeffrey A. Stec (11/12/24)	Highlighted portions at Pg. i, 4-7, 12-18, 20, 25-28, 30, 35-38, 40, 42-56	Sancheti Decl.
27*	Exhibit 16 GOOG-CSUPO-00007429	Fully Under Seal	Sancheti Decl.
28*	Exhibit 17 GOOG-CSUPO-00039998	Fully Under Seal	Sancheti Decl.
Google's Motion to Exclude Unreliable Technical Analyses (3/11/2025)			
29†	Memorandum of Points and Authorities iso Google's Motion to Exclude Unreliable Technical Analyses	Highlighted portions at Pg. 13-14, 16-17, 19-20, 21-23, 25	Baillie Decl. (Pg. 19-20, 21-23, 25); Klausecker Decl. (Pg. 13-14, 16-17)
Declaration of Max Bernstein ISO Motions to Exclude (3/11/2025)			
5†	Exhibit 1 Expert Report of Christopher Thompson (11/12/24)	Highlighted portions at Pg. 10-46, 49-56, 60-69, 73, 75, 80, 88-90, 92-93	Baillie Decl. (Pg. 10-30, 60); Do Decl. (Pg. 31-44); Sancheti Decl. (Pg. 45-46); Gustafson Decl. (Pg. 49-50, 54-56); Benko Decl. (Pg. 51-53); Klausecker (Pg. 61-69, 73, 75, 80); Sancheti Decl. (Pg. 88-90, 92-93)
10*	Exhibit 2 <i>Csupo</i> Expert Report of Dr. Douglas Schmidt (1/9/23)	Highlighted portions at Pg. ii, iii, 7, 11, 17-35, 38-62, 64-74, 80, 82-84, 90-92, 101-108	Sancheti Decl. (ii, iii, 7, 11, 17-18, 38-62, 64-65, 79-80, 90-92); Baillie Decl. (Pg. 19-28, 82-84, 101-108); Do Decl. (Pg. 28-35); Klausecker Decl. (Pg. 65-75)
2†	Exhibit 3 Expert Report of Dr. Jeffrey Stec (11/12/24)	Highlighted portions at Pg. i, 4-7, 12-18, 20, 25-28, 30, 35-38, 40, 42-56	Sancheti Decl.
30†	Exhibit 7 Supplemental Analysis of Network Usage Data of Dr. Kevin Jeffay (1/15/25)	Highlighted portions at Pg. 7-11, 15, 21-23, 26-27	Do Decl. (7-11); Sancheti Decl. (Pg. 15); Klausecker Decl. (Pg. 21-22, 26-17); Baillie Decl. (Pg. 22-23);
31†	Exhibit 8 Supplemental Expert Report of Dr. Jeffrey Stec (10/21/24)	Highlighted portions at Pg. i, 4, 9-14, 16, 21-24, 26-27, 29, 31-49	Sancheti Decl.
32†	Exhibit 10 Excerpts from deposition of Christopher Thompson (1/6/25)	Highlighted portions at Pg. 264:1-6; 269:5-9; 440:24-25	Baillie Decl.

23†	Exhibit 11 Expert Report of Dr. Kevin Jeffay (3/10/25)	Highlighted portions at Pg. 21-27, 34-38, 40, 42-45, 54-57, 61-65, 68, 70-71	Benko Decl. (Pg. 21-27); Baillie Decl. (Pg. 34-38, 40, 61-65); Klausecker Decl. (Pg. 42-44); Sancheti Decl. (Pg. 45, 54-57, 70-71); Do Decl. (Pg. 68)
25†	Exhibit 13 Supplemental Analysis of Network Usage Data of Dr. Kevin Jeffay (3/10/25) (Updated version of exhibit 7)	Highlighted portions at Pg. 8, 19, 21-22	Baillie Decl. (Pg. 8); Klausecker Decl. (Pg. 19, 21-22)
33*	Exhibit 14 GOOG-CSUPO-00023499	Fully Under Seal	Klausecker Decl.
34	Exhibit 16 Updated Scripts and Data of Christopher Thompson (12/22/24)	Fully Under Seal	Sancheti Decl.
35*	Exhibit 17 <i>Csupo</i> - Declaration of Borbala Benko ISO Google's Opp. to Second Class Cert (2/4/25)	Highlighted portions at Pg. 3-6	Benko Decl.
26†	Exhibit 18 Expert Report of Dr. Sandeep Chatterjee (1/15/25)	Highlighted portions at Pg. 43	Gustafson Decl.
3†	Exhibit 20 Expert Report of Dr. Christopher Jules White (11/12/24)	Highlighted portions at Pg. 10, 11, 14-25, 30, 33, 42, 56-62, 64-71, 73-84, 86-88	Sancheti Decl. (Pg. 10-11, 14-20); Baillie (Pg. 21); Klausecker (Pg. 22-25, 56-62, 64-70); Stacy Decl. (Pg. 33, 74-84, 86-88); Benko Decl. (Pg. 73-74)
36†	Exhibit 21 Excerpts from deposition of Noha Elarief (12/11/24)	Highlighted portions at Pg. 101:1-6	Sancheti Decl.
Declaration of Marc A. Wallenstein ISO Motion to Exclude Expert Testimony (3/11/25)			
37†	Exhibit B Expert Report of Dr. Kevin Jeffay (1/15/25)	Highlighted portions at Pg. 20-26, 33-37, 39, 41-44, 53-56, 60-64, 67, 69-70	Benko Decl. (Pg. 20-26; Baillie Decl. (Pg. 33-37, 39, 60-64); Klausecker Decl. (Pg. 41-43); Sancheti Decl. (Pg. 44, 53-56, 69-70); Do Decl. (Pg. 67)
Declaration of Chad E. Bell ISO Opp. to Motion to Exclude re Damages (5/7/25)			
2†	Exhibit 2 Expert Report of Dr. Jeffrey Stec (11/12/24)	Highlighted portions at Pg. i, 4-7, 12-18, 20, 25-28, 30, 35-38, 40, 42-56	Sancheti Decl.

38*	Exhibit 10 GOOG-CSUPO-00024114	Fully Under Seal	Sancheti Decl.
39*	Exhibit 11 GOOG-CSUPO-00027624	Fully Under Seal	Sancheti Decl.
40*	Exhibit 17 GOOG-CSUPO-00017089	Fully Under Seal	Sancheti Decl.
41*	Exhibit 18 GOOG-CSUPO-00039167	Fully Under Seal	Sancheti Decl.
Plaintiffs' Opposition to Motion to Exclude re Technical Analyses (5/7/25)			
42†	Memorandum of Points and Authorities iso Plaintiffs' Opposition to Motion to Exclude re Technical Analyses	Highlighted portions at Pg. 9-10, 21-24	Sancheti Decl.
Declaration of Karma Guilianelli ISO Plaintiffs' Opposition to Motion to Exclude re Technical Analyses (5/7/25)			
2†	Exhibit 1 Expert Report of Dr. Jeffrey Stec (11/12/24)	Highlighted portions at Pg. i, 4-7, 12-18, 20, 25-28, 30, 35-38, 40, 42-56	Sancheti Decl.
43†	Exhibit 2 GOOG-CSUPO-00010605	Fully Under Seal	Sancheti Decl.
34†	Exhibit 4 Updated Scripts and Data of Christopher Thompson (12/22/24)	Fully Under Seal	Sancheti Decl.
44†	Exhibit 6 Excerpts from deposition of Christopher Thompson	Highlighted portions at Pg. 354:17-18; 356:6-20; 450:12-14; 456:14-457:3; 461:6-9; 461:17-20	Sancheti Decl.
45†	Exhibit 9 Updated Calculations of Dr. Jeffrey Stec (1/20/25)	Fully Under Seal	Sancheti Decl.
46†	Exhibit 11 Expert Report of Christopher Thompson (10/16/24)	Highlighted portions at Pg. 7-8, 10-35, 37-52, 56	Baillie Decl. (Pg. 7-8, 16-31); Do Decl. (Pg. 10-15); Sancheti Decl. (Pg. 32-35, 56); Gustafson Decl. (Pg. 37-39, 43-47); Benko Decl. (Pg. 39-42); Klausecker (Pg. 48-52); Sancheti Decl. (Pg. 88-90, 92-93)
47*	Exhibit 12 GOOG-CSUPO-00010453	Fully Under Seal	Klausecker Decl.
48*	Exhibit 13 GOOG-CSUPO-00010448	Fully Under Seal	Klausecker Decl.
49†	Exhibit 15 Data Appendix of Dr. Douglas Schmidt (1/19/23)	Fully Under Seal	Sancheti Decl.

50*	Exhibit 17 GOOG-CSUPO-00023499	Fully Under Seal	Klausecker Decl.
51*	Exhibit 18 GOOG-CSUPO-00008092	Fully Under Seal	Baillie Decl.
52†	Exhibit 19 Supplemental Expert Report of Dr. Kevin Jeffay (2/19/2025)	Highlighted portions at Pg. 8, 19, 21-22	Baillie Decl. (Pg. 8); Klausecker Decl. (Pg. 19, 21-22)
53*	Exhibit 20 GOOG-CSUPO-00008277	Fully Under Seal	Do Decl.
54*	Exhibit 24 GOOG-CSUPO-00013065	Fully Under Seal	Sancheti Decl.
55*	Exhibit 25 GOOG-CSUPO-00049286	Fully Under Seal	Gustafson Decl.
56*	Exhibit 26 GOOG-CSUPO-00026635	Fully Under Seal	Gustafson Decl.
57*	Exhibit 27 GOOG-CSUPO-00043524	Fully Under Seal	Gustafson Decl.
58*	Exhibit 28 GOOG-CSUPO-00026725	Fully Under Seal	Baillie Decl.
59†	Exhibit 29 GOOG-CSUPO-00024861	Fully Under Seal	Baillie Decl.
60†	Exhibit 30 GOOG-CSUPO-00049352	Fully Under Seal	Gustafson Decl.
61*	Exhibit 31 GOOG-CSUPO-00030368	Fully Under Seal	Sancheti Decl.
62†	Exhibit 32 GOOG-CSUPO-00024815	Fully Under Seal	Klausecker Decl.
63†	Exhibit 33 Expert Report of Dr. Kevin Jeffay (2/19/2025)	Highlighted portions at Pg. 20-26, 33-37, 39, 41-44, 53-56, 60-64, 67, 69-70	Benko Decl. (Pg. 20-26; Baillie Decl. (Pg. 33-37, 39, 60-64); Klausecker Decl. (Pg. 41-43); Sancheti Decl. (Pg. 44, 53-56, 69-70); Do Decl. (Pg. 67)
64†	Exhibit 35 GOOG-CSUPO-00029286	Fully Under Seal	Sancheti Decl.
65†	Exhibit 36 Excerpts from deposition of Noha Elarief (12/11/24)	Highlighted portions at Pg. 101:1-4	Sancheti Decl.

6. Each of the above are attached hereto as **Exhibits 1-65** to this declaration.

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I declare under the penalty of perjury that the foregoing is true and correct.

Executed on August 13, 2025, at Los Angeles, California

/s/ Ariana E. Bustos
Ariana E. Bustos